

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA

IN RE:

MERCY HOSPITAL, IOWA

Debtor.

CASE NO. 23-00623

Chapter 11

**OBJECTION TO THE TRUSTEE’S OBJECTION TO CROSSMED HEALTHCARE  
STAFFING SOLUTIONS CLAIM # 10231**

COMES NOW the creditor, Crossmed Healthcare Staffing Solutions, Inc. (“Crossmed”), by and through its undersigned counsel, and files its Objection to the Trustee, of the Mercy Hospital Liquidation Trust’s (the “Trustee”) Objection to Claim and Notice of Objection Bar Date. In support of its said Objection, Crossmed states and alleges as follows:

1. Crossmed timely filed is unsecured Proof of Claim in the amount of \$127,582.75 in this bankruptcy proceeding on or about October 13, 2023 (the “Crossmed Claim”).
2. Crossmed provided staffing services for the benefit of the Debtor Mercy Hospital, Iowa (the “Hospital”).
3. Crossmed has not been paid for the services which it provided for the benefit of the Hospital and the total amount of unpaid services as of the date the Hospital filed this bankruptcy proceeding was \$127,582.75.
4. Crossmed has discussed this matter with the Trustee’s counsel and the Trustee’s counsel agreed to allow Crossmed until June 15, 2025 to file a response to its Objection.
5. The Trustee’s Objection to the Crossmed Claim contains no substantive information as to the basis for its objection to the Crossmed Claim.

6. Given the fact that the Trustee's Objection does not contain supporting information and specific allegations as to the basis of the objection, Crossmed states that its proof of claim filed in this bankruptcy case be allowed and the Trustee's Objection be overruled.

WHEREFORE, Crossmed prays this Court for an Order overruling the Trustee's Objection to the Crossmed Claim and further requests that the Court allow the Crossmed Claim as a general unsecured claim and for such other and further relief as the Court deems just and proper.

Dated this 13th day of June 2025.

/s/ Michael J. Whaley  
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& Oldfather, LLP  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 13th, 2025, I caused the above document to be filed with the Clerk of the Court using the CM/ECF system which gave notification electronically upon all parties who filed an appearance by electronic filing in this case, and I hereby certify that I have mailed by first class United States mail, postage prepaid, the document to the following:

None.

/s/ Michael J. Whaley